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November 30, 2020

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall United States Courthouse,
Room 1506 40 Foley Square
New York, New York 10007

Re: *United States v. Mayur Rele*,
Southern District of New York
19 Cr. 842 (RA)

Dear Judge Abrams:

The undersigned filed a notice of appearance and substitution of counsel on November 23, 2020. Counsel thereafter conferred with Assistant United States Attorney Kristy J. Greenberg and the parties provide the following status update and adjournment requests to the Court:

1. Discovery Status Update.

In the Government's September 4, 2020 letter to the Court, the Government advised that it produced the materials from FBI's responsiveness review of search warrant returns to prior defense counsel that same day. The undersigned has conferred with Assistant Federal Defender Ariel Werner who advised that the discovery in this matter is voluminous (in excess of ten terabytes) and that her office will expedite duplication and provide to retained counsel as soon as possible. This Court had granted prior counsel three months to review the discovery.

2. Adjournment Request.

Accordingly, as the undersigned does not yet have the discovery and will require considerable time to review it once received, defense counsel respectfully requests an adjournment of the current pretrial motions schedule, and the Government has no objection to this request. The parties propose the following schedule for pretrial motions:

Defense pretrial motions due on March 29, 2021, Government responses due on May 7, 2021, and Defense reply due on May 28, 2021.

2. Trial Availability.

Given the proposed adjournment of the pretrial motions schedule, the parties also respectfully request an adjournment of the final pretrial conference date and the trial date in this case from June 14, 2021 to a date in October 2021. The parties do not have any conflicts in October 2021.

Upon consent, the parties also seek an exclusion of time from the Speedy Trial Clock between June 14, 2021 and the new trial date so that defense counsel and the defendant can review discovery to determine if any pretrial motions are to be made, and the parties can litigate any motions, prepare for trial, and engage in discussions about a pretrial disposition.

Respectfully submitted,

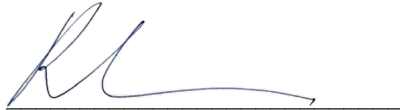
/s/ Paul Wiegartner, Jr.

Paul Wiegartner, Jr., Esq.
Counsel for Defendant

cc: Kristy J. Greenberg, Esq. (by ECF)

The Court adopts the parties' proposed motion briefing schedule. The trial is adjourned from June 14, 2021 to October 18, 2021. A final pretrial conference is scheduled for October 15, 2021 at 11:00 a.m. Pretrial submissions shall be due September 14, 2021, responses by September 24, 2020 and any replies by October 1, 2021. Time is excluded until October 18, 2021, under the Speedy trial Act, pursuant to 18 U.S.C. Section 3161(h)(7)(A).

SO ORDERED.



Ronnie Abrams, U.S.D.J.
November 30, 2020